



National Republican Congressional Committee

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March 13, 1997

Ms. Jennifer K. Wall
Reports Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20436

Re: C00075820 - Amended June Monthly Report (5/1/96-5/31/96) received 10/11/96
July Monthly Report (6/1/96-6/30/96)
Amended July Monthly Report (6/1/96-6/30/96) received 10/11/96

Dear Ms. Wall:

Attached, please find an amended Schedule H2 for the July Monthly Report (6/1/96-6/30/96) showing the event date and the effective date of the ratio change.

Additionally, please find copies of reports filed with the Commission, as well as explanations detailed below, which will answer questions you raised in your letters dated 2/26/97.

-The Amended June Monthly Report (5/1/96-5/31/96) filed 10/11/96 shows a total of \$318,046.10 in Transfers from the Non-Federal account for Joint Activity. Your total however indicates a difference of \$2,708.00, the total of the last page (page 16) of Schedule H3. After re-calculating these pages, we have found no error in our addition. I am forwarding a copy of Schedule H3 supporting Line 18 as filed on 10/11/96.

-You raised questions regarding the reporting of in-kind contributions made to the Committee in the periods covered in the Amended June Monthly Report (5/1/96-5/31/96) filed 10/11/96, and the Amended July Monthly Report (6/1/96-6/30/96), also filed 10/11/96. Schedule H4 supporting Line 21(a) which you provided shows each of these contributions, the donor, and the fundraising event involved. Below each entry, or group of entries for one event, the NRCC transfer for the federal portion is listed. Additionally, the itemization of each transfer amount is shown on Schedule H3 and includes the date the Committee received the in-kind contribution(s), and the fundraising event involved. Therefore, it appears that the Committee is in compliance with all regulations detailed in Advisory Opinion 1992-33.

320 First Street, S.E.
Washington, D.C. 20003
(202) 479-7020

-Your letters question several fundraising events reflected on the NRCC's reports which were eventually reported as either 100% non-federal or 100% federal. By way of explanation, each event run by the NRCC initially is intended to be a joint fundraising event for the NRCC's federal and non-federal accounts. The NRCC therefore reports these events in accordance with the FEC's allocation and reporting regulations. However, despite the NRCC's intent that all events be joint fundraising events, and due to no control of our own, some events, such as the ones identified in your letters, do not raise any non-federal funds, and others do not raise any federal funds. Initially reported ratios are best effort estimates, that more often than not, are revised in succeeding months. For consistency, however, once the NRCC has reported an event as an allocable activity we continue to report the event on the Schedule H's as an allocable activity, and simply adjust the ratio as appropriate. The NRCC does not generally pay for events which it affirmatively knows will be either 100% non-federal or 100% federal events out of the allocation account and but for this unusual circumstance would not have done so with respect to the events you identify. Thus, it is our understanding that because the Committee appropriately followed the allocation rules under 11 C.F.R. 106.5 it is not necessary to make any transfer from the federal account to the non-federal account in connection with these events.

If you have any questions or concerns please contact me at 202/479-7027.

Sincerely,

Donna M. Singleton
Donna M. Singleton
Treasurer

Federal Election Commission
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